Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum for Wind Profiler Radar Systems	)	PR Docket No. 93-59
	)	RM No. 8092

TO: The Commission

COMMENTS OF MARK IV IVHS DIVISION

Mark IV IVHS Division ("Mark IV"), herewith, by its attorneys, files its comments in response to the Commission's Notice of Proposed Rulemaking and Notice of Inquiry in the above-captioned docket ("Windprofiler NOI").

Mark IV is a manufacturer of wideband AVM devices which are widely used by highway, toll, turnpike, tunnel and bridge authorities in a variety of IVHS applications. Mark IV systems are licensed under the Commission's Part 90 rules for interim AVM operations to operate with a six MHz wideband carrier in the 904-912 MHz portion of the AVM band. The system employs vehicle mounted transponders which are Part 15 certificated wideband devices operating in the 912-918 MHz frequency.

We strongly support the Commission's initiatives in its Automatic Vehicle Monitoring ("AVM") Systems Rulemaking (PR Docket No. 93-61) which confirm the vital importance of AVM systems to meet a wide range of public needs. The recent growth in the number of authorized AVM systems of all kinds, the large number of new applications being filed and the expanded procurement of AVM systems by highway, toll, turnpike, bridge and tunnel authorities reflect the rapidly increasing need for allocations to support AVM spectrum uses. These demands for spectrum are likely to increase dramatically if the Commission's proposals to expand eligibility and permissible uses of AVM spectrum are adopted.

The Commission's channelization plan proposed in its AVM Rulemaking contemplates AVM frequency uses in the 904-912 MHz, 912-918 MHz and 918-926 MHz bands, all of which overlap one or another of the frequency bands being considered for possible windprofiler radar system use. The potential for harmful interference from high powered windprofiler radar systems into co-channel adjacent AVM systems is a very serious concern, particularly as AVM spectrum uses grow to meet the continued demands of businesses, governments and individuals.

Based upon the information available to Mark IV, we oppose any 915 MHz allocation for windprofilers to avoid potentially harmful interference cases.

Respectfully submitted,

MARK IV IVHS DIVISION

/s/ George Y. Wheeler
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Its Counsel